



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

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Reply To
Attn Of: ECO-088

MAY - 1 2002

01-033-BPA

Stacy Mason
Bonneville Power Administration
P.O. Box 3621-KEC
Portland, OR 97208-3621

Dear Ms. Mason:

We have reviewed the draft Environmental Impact Statement (EIS) for the proposed *McNary-John Day Transmission Line Project* (CEQ #020083) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The draft EIS examines the proposed construction of a new 500-kilovolt transmission line parallel to existing Bonneville Power Administration (BPA) transmission lines from the McNary Substation to the John Day Substation, a distance of approximately 79 miles.

We have rated the EIS, EC-2 (Environmental Concerns- Insufficient Information). We have environmental concerns with the project due to the large information gaps found throughout the document. In addition, the organization and content of the EIS appears inconsistent with NEPA regulations which direct federal agencies to use NEPA procedures to ensure that 1) environmental information is available to public officials and citizens before decisions are made and before actions are taken (40 CFR 1500.1(b)) and 2) the EIS is supported by evidence that agencies have made the necessary environmental analyses (40 CFR 1500.2(b)).

The draft EIS begins by describing BPA's responsibility for purchasing, developing, marketing, and transmitting electrical power to utility, industrial, and other customers in the Pacific Northwest. We believe that the EIS requires additional supporting information indicating 1) if the need for additional power in the Pacific Northwest exists now and would be needed in the future, and 2) if so, to what extent would power transmitted via the proposed line serve Pacific Northwest customers versus customers outside the Region. We find this information necessary in light of information found in the recent EIS for *Irene and Anderson Creek Projects* (FERC 2002) that indicates that reserve capacity as a percent of firm peak summer demand in the Western Systems Coordinating Council region is projected to increase from 22.4 percent in 2001 to 46.7 percent in 2008, falling to 36.8 by 2010. Moreover, the broad purpose and need statement of meeting energy demands in the Pacific Northwest does not answer questions of why the need to generate and deliver power in the Pacific Northwest should be addressed by constructing a transmission line specifically between McNary and John Day substations (i.e., the EIS should answer the question "why here" and "why now"). This question is especially relevant because BPA is concurrently proposing the construction of multiple transmission lines without explaining how the individual projects would address the larger need. This information should be included in the EIS.



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The alternatives section effectively presents one action alternative and the No Action alternative. While the EIS presents slight variations in the alignment and presents each set of changes as different alternatives, these small changes do not sharply define the issues and provide a clear basis for choice among options by the decisionmaker and the public as required by NEPA (see 40 CFR 1502.14). This is especially true when larger systemic alternatives exist such as demand management, distributed generation, interruptible/curtailable rates and transmission pricing solutions as well as the possible rerouting of electricity in the grid through other transmission lines. The EIS presents the No Action alternative in a very cursory fashion using two sentences and does not include it in tables for comparing the effects of alternatives. The EIS should discuss and evaluate the No Action alternative in greater detail and include it for comparison purposes as directed by the NEPA regulations (40 CFR 1502.14). The purpose and need or alternatives sections should also include the rationale for limiting the scope of the project to the proposed transmission line between termini at the John Day and McNary substations versus extending it, possibly between the proposed Wallula power project and McNary substation since an additional line is proposed there.

The affected environment, mitigation measures, and environmental consequences sections of the draft EIS are more characteristic of a programmatic EIS than the site-specific one required for this project with 1) broad, general descriptions of most affected resources rather than site-specific baseline and project information, 2) a conditional list of mitigation measures without an indication of their applicability, where they would be applied, or their effectiveness, and 3) a general and cursory assessment of the expected effects. We were surprised that the EIS presents a cursory description of the affected environment given that BPA has operated the corridor where the transmission line is proposed for years. The lack of information suggests that BPA has not historically monitored resources in the corridor. The little detailed information on resources presented in the EIS is largely derived from existing data that other agencies collected. The lack of site-specific project information, such as the proposed location of the transmission line towers, access roads, and staging areas also indicates that BPA has not conducted fundamental project surveys.

The EIS lists numerous best management practices and mitigation measures without providing a context for them. Our enclosed detailed comments reference multiple instances where the EIS does not indicate if or where proposed mitigation measures would be implemented and the effectiveness of identified measures. Understandably, the lack of site specific information on resources, project elements, and mitigation measures results in an inconclusive evaluation of the environmental consequences of the project. Moreover, conclusions in the EIS that the proposed project's effects to resources are insignificant appear unsupported.

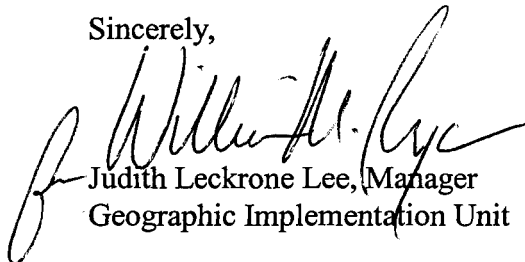
Finally, the EIS contains little discussion of the predicted cumulative impacts from the project. Consistent with the Council on Environmental Quality's guidance entitled *Considering Cumulative Effects under NEPA*, we recommend that the cumulative impact section be resource-based rather than project-based and that this section look at a range of impacting projects that extends beyond a sole focus on power projects. Additionally, in light of the little information in

the EIS on the affected environment, the document should include a monitoring plan that identifies monitoring objectives (e.g., implementation of mitigation measures or effectiveness of mitigation measures), states how monitoring would be carried out and data used, and lists appropriate mitigation measures to employ if monitoring reveal unsatisfactory environmental effects.

In conclusion, proposing to place a new transmission line in an existing transmission line corridor would appear to minimize impacts. NEPA, however, requires BPA to take a hard look at the elements of the proposed project including the need for the project, a full range of reasonable alternatives (including those outside the jurisdiction of the lead agency if appropriate), a site-specific discussion of mitigation measures and their effectiveness, and a sufficient discussion of the affected environment and environmental consequences so that the decisionmaker and public can contrast and compare alternatives. EPA additionally recommends a monitoring strategy for resources that provides a feedback loop for correcting project effects deemed to be unacceptable.

Our rating and a summary of our comments will be published in the *Federal Register*. A copy of the rating system used in conducting our review is enclosed for your reference. Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact Chris Gebhardt at (206) 553-0253.

Sincerely,



Judith Leckrone Lee, Manager
Geographic Implementation Unit

Enclosures

cc: Yakama Nation
Colville Tribe
U.S. Fish and Wildlife Service
National Marine Fisheries Service

EPA Detailed Comments on the Proposed McNary-John Day Transmission Line Project

The EIS should list and describe all power production and environmental laws applicable to this project.

Page S-1 - The EIS states that Bonneville is facing two problems regarding power flow on the Federal Columbia River Transmission System (FCRTS): there is not enough electricity being generated to meet demand, and many of Bonneville's transmission lines are now at capacity and cannot carry more power. The draft EIS issued by the Federal Energy Regulatory Commission for the proposed Irene Creek and Anderson Creek Hydroelectric Projects in the Skagit River Basin states that "although energy shortfalls occurred in the Western Systems Coordinating Council region in 2000-2001, reserve capability as a percent of firm peak summer demand is projected to increase from 22.4 percent in 2001 to 46.7 percent in 2008, and falling to 36.8 by 2010." This statement is consistent with the slowing influx and the slowing economy in the west coast cities of Seattle and Portland. The EIS should include power need projections that demonstrate that building the proposed transmission line is needed to ensure power reliability. Moreover, the statement that many of Bonneville's transmission lines are now at capacity does not indicate that a transmission line, specifically the one between the McNary and John Day dam facilities is needed. The purpose and need statement in the EIS should explain "why here" and "why now".

Page S-3 states that some new right-of-way easements would need to be purchased adjacent to the existing corridor along approximately 14 miles of the route. The EIS should state if the owners of parcels proposed to be crossed by the transmission line have been contacted by BPA and whether tentative agreements have been reached. The EIS should also state how BPA will deal with owners refusing offers for right-of-way easements (e.g., by using alternative routes or exercising eminent domain). This information will help readers and the decision-maker understand the viability of option available to BPA in selecting the alignment of the proposed transmission line.

Page S-4 - The EIS should describe temporary staging areas (a map of their locations), their uses, and how they will be restored. EPA is concerned that the use of such areas for refueling or lubricating equipment might result in the contamination of the surrounding area (through fuel spills and stormwater runoff) and that these areas might not be fully restored.

Page S-4 - The EIS states that vegetation would be maintained along the line for safe operation and to allow access to the line. The EIS should summarize direction provided by the earlier *BPA Vegetation Management EIS* and apply that direction to the proposed transmission line. Specifically, the EIS should include a weed control management plan that utilizes Integrated Pest Management (IPM). EPA supports using manual, cultural, and biological alternatives over pesticides when possible because of the potential problems from the fate and transport of pesticides in the environment.

Pages S-5 and S-6 list alternatives. The range of alternatives is quite constrained with variations consisting of small alignment changes in four locations. Although EPA supports limiting environmental impacts by using an area that is already impacted, this does not excuse a lead agency from its NEPA responsibility of exploring a full range of alternatives. Noticeably lacking from the alternatives' analysis are options that go beyond changes in alignment such as demand management, distributed generation, interruptible/curtailable rates and transmission pricing solutions.

Page S-7 states that the overall cost of removing one of the existing lines and constructing a double circuit line would be much greater than constructing the single circuit line. The EIS should state if the benefit-cost analyses referred to in this sentence includes environmental costs. If not, the EIS should incorporate environmental costs in the analyses of overall costs. In addition, we recommend that the EIS reexamine this alternative because it would appear to minimize the footprint of environmental impacts. This would be consistent with NEPA's requirement to minimize impacts.

Page S-9 describes cropland, grazing, and upland areas impacted by the project. The EIS should also state the acres of wetlands impacted by action alternatives.

Page S-9 identifies the following mitigation measures: coordinate with landowners for farm operations, including plowing, crop dusting, and harvesting. It is presumed that this mitigation measure would minimize airborne pollutants, however, timing these activities could also minimize spikes in non-point source water pollution. The EIS should indicate the resource or resources that this measure is helping to protect.

Page S-9 does not describe how BPA would control weeds around the base of the towers. The EIS should contain this information.

Page S-11 contains the following mitigation measure: avoid construction on steep slopes where possible. The EIS should define steep slopes, identify where steep slopes occur in the project area, and where construction on steep slopes could and could not be avoided.

Page S-11 contains the following mitigation measure: install appropriate roadway drainage to control and disperse runoff. The EIS should identify specific locations in the project area needing roadway drainage structures and the appropriate drainage structure(s) for each site.

Page S-11 contains the following mitigation measure: develop additional mitigation measures (using a certified engineer) between corridor miles 39 and 41 due to the presence of an active landslide in the vicinity of tower 40/3. A certified engineer should evaluate the active landslide area prior to completing the EIS and appropriate mitigation measures should be included in the EIS for the public and decision-maker to review. The EIS should identify appropriate site-specific mitigation measures.

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Page S-11 states that five of the 11 fish-bearing streams along the project corridor were found to have water temperatures in excess of 64.4 degrees F during the June 2001 surveys. The EIS should state what temperatures were measured. In addition, the EIS should also identify measures that BPA is using or could use to mitigate the impacts of high temperatures in these streams.

Page S-12 states that several common construction materials and petroleum products could be toxic to fish and other aquatic organisms if spilled into or near streams. A Spill Prevention and Contingency Plan should be included in the EIS and should state the spill risk, identify sources of toxic materials and environmental resources at risk, and mitigation measures.

Page S-13 contains the following mitigation measure: place towers outside of stream riparian areas and utilize natural landscape features to space the conductor over existing shrub and tree riparian zones and avoid cutting. The EIS should identify areas where proposed towers would need to be set in new locations to avoid stream riparian areas and to utilize natural landscape features to space the conductor over shrub and tree riparian zones and avoid cutting.

Page S-13 contains the following mitigation measure: avoid tower or access road construction on potentially unstable slopes where feasible. The EIS should identify these areas.

Page S-13 contains the following mitigation measure: install appropriate water and sediment control devices at all dry wash crossings, if necessary. The EIS should identify dry wash crossings needing water and sediment control devices and the appropriate water and sediment control device for each site.

Page S-13 contains the following mitigation measure: construct any required culverts using Washington Department of Fish and Wildlife culvert installation guide. The EIS should identify places where culverts would be installed, state the appropriate culvert size, and list mitigation measures to be used during installation.

Page S-14 contains the following mitigation measure: develop and implement a Spill Prevention and Contingency Plan to minimize the potential for spills of hazardous material. The EIS should contain the Spill Prevention and Contingency Plan and the environmental consequences section should predict the number and extent of hazardous material spills and impacts of these spills with implementation of the Plan.

Page S-16 contains the following mitigation measure: locate structures, new roads, and staging areas so as to avoid waters of the United States, including wetlands. The EIS should contain maps identifying the proposed locations of roads and staging demonstrating that they lay outside waters of the United States.

Page S-16 contains the following mitigation measure: anticipate and avoid, as required, contaminated soil, underground tanks, and orphaned wells during construction. The EIS should

identify these sites in the EIS and alter transmission line and road alignments, if necessary, to avoid these sites.

Page S-17 states that the proposed project would temporarily impact 24 to 27 acres of native plants and 4 acres of cryptogamic crusts and permanently impact 12 acres of native plants and 2 acres of cryptogamic crusts. The EIS should identify existing projects in the area that aim to restore or protect native plant communities and cryptogamic crusts, including those receiving BPA funding. If none exist, BPA should consider incorporating the restoration of native plant communities and cryptogamic crusts into the project design.

Page S-20 describes environmental consequences of the project on wildlife species. The section addresses in a cursory fashion the effect of the existing corridor and, to a lesser extent, the proposed project on habitat fragmentation. The corridor, access roads, and transmission lines serve as an obstacle to animals migrating through the area. The corridor and road likely deter terrestrial animals from crossing due to lack of cover, reduced forage and browsing opportunities for species, changes in wildlife migrations patterns, and occasional human activity in these areas. The EIS demonstrates that transmission lines act as a barrier to bird movement. We are concerned that transmission lines could separate the cliff nesting areas for bald eagles from the riverine areas where bald eagles hunt. In addition, the corridor creates edge effects which likely favor several bird and wildlife species. The EIS should discuss in greater detail the effect of the corridor, access roads, and transmission lines on habitat fragmentation and the creation of edge effects favoring some species.

Pages S-25 and S-26 discuss viewshed impacts. BPA should consider including maps that identify sections of SR14 where the proposed project would be visible.

Page S-31 describes the environmental consequences of the proposed project to air quality. The EIS does not examine the foreseeable future actions associated with building the power line. For example, are future gas-powered electricity generators more likely to be located close to the power line, thus concentrating impacts from air emissions. The EIS should discuss foreseeable future actions associated with this project.

Page S-32 states that "If helicopters are used to install the towers a wider range of residences could be affected." Because helicopters could potentially be used to install towers, the impact analyses in the EIS should reflect their use.

Page S-34 states that predicted field levels are only indicators of how the proposed project may affect the magnetic-field environment. They are not measures of risk or impacts on health. The latter is what NEPA requires. The EIS should contain the best prediction of health risks based on available information.

Page S-35 contains the following mitigation measure: crop dusting pilots planning to enter the area would take suitable precautions to avoid collision with the proposed transmission line. We

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recommend that this mitigation measure be rewritten to reflect an action that the lead agency could take (e.g., educate crop dusting pilots about the location of the proposed transmission line).

Table S-2 is difficult to read because the list of impacts run together and the font is small. We recommend that the table be enlarged with the impacts bulleted and possibly broken down by resources impacted. In addition, the table lacks the no-action alternative. The table should include this alternative to compare the impacts of the action alternatives, as required by the NEPA regulations.

Page 1-1 states that presently, Bonneville is facing two problems regarding power flow on the system: there is not enough electricity being generated to meet demand, and many of Bonneville's transmission lines are now at capacity and cannot carry more power. The EIS should discuss how the demand for electricity generation and transmission is determined.

Page 1-1 states that southeast Washington and northeast Oregon is a prime area for power generation because of sufficiency of wind or access to gas pipelines, as well as access to high voltage transmission lines. The EIS should describe how providing additional transmission infrastructure in the area could make the area additionally attractive for even more power generation and the cumulative impacts of concentrated transmission in this area.

Page 1-1 states that Bonneville has a statutory obligation to ensure that there is sufficient capacity and reliability in Bonneville's transmission line. The EIS should define sufficient capacity and reliability, state existing capacity and reliability levels, and identify the difference between the required capacity and reliability levels and existing levels.

Page 1-2 contains a sidebar discussion of the Need for Power which describes power plants coming on line. The EIS should list power projects scheduled to go on line, the power each proposed plant would develop, the chance that each proposal would go on line, and projections of the total power produced versus projected need for power.

Page 1-3 identifies the following as a decision to be made: Bonneville must decide whether or not to build the proposed McNary-John Day transmission line. The cursory level of treatment given to the No Action Alternative indicates that it is not an option given serious consideration: Tables S-2 and 2-1 do not lay out impacts resulting from implementation of the No Action Alternative and Chapter 2 describes the No Action Alternative in two sentences.

Page 1-3 states that if the decision is to build a new transmission line, Bonneville would determine the exact locations of the towers and access roads and choose among the mitigation measures identified in the EIS. The site-specific elements of the project need to be defined in the EIS in order to analyze the effects of constructing and operating the specific transmission line being evaluated in the EIS.

Page 2-1 states that the environmental review to provide Benton County PUD electrical service would be done at the time the electrical service is requested. The EIS should state the level of certainty that Benton County PUD would request electrical service. If Benton County PUD receiving electrical service is a reasonably foreseeable future action (e.g., a signed agreement already exist), the EIS should incorporate this proposed activity into the scope of the project, environmental studies supporting this activity should be completed prior to issuance of the final EIS, and, if appropriate, the alternative section should explain options associated with the hookup.

Page 2-5 and other pages in the EIS refer to a “bus work.” The EIS should define a bus work.

Page 2-9 describes the process for line planning and construction. The EIS should contain the results of surveys including 1) determinations of the profile of the ground, 2) the proposed locations for towers, roads, and staging areas, and 3) the required right of way.

Page 3-2 states that Bonneville is considering moving the entire corridor off tribal lands. The EIS should contain more information explaining why a significant part of the alternatives’ development focused on considering moving the corridor off tribal lands. Are tribal owners requesting that the transmission lines not cross their lands? Moreover, the EIS should identify which alternatives are more consistent with meeting federal tribal trust responsibilities.

Page 3-2 lists the following locations without explaining their nomenclature: 6/1, 7/2, 10/4, 22/3, 29/3, 30/1, 68/1, 68/5, and 69/4. The EIS, preferably in a sidebar, should explain the basis of this nomenclature or include a map of towers identified by this nomenclature.

Pages 3-6 and 3-7 states that Umatilla County’s zoning designation for the project corridor is F1, Exclusive Farm Use. A noncommercial utility facility is permitted outright in the F1, Exclusive Farm Use zone, and the proposed action thus would not be inconsistent with this designation. The EIS should define a noncommercial utility facility in this context. A transmission facility seemingly appears more of a commercial use than a residential or farm use.

Page 3-16 states that erosion rates would most likely return to their current level following construction if plants reestablished along the corridor, naturally, or through revegetation. The EIS should predict the time it would take for plants to reestablish themselves to the extent that erosion rates would return to natural levels, the level of soil loss in the interim, differences between existing vegetation and recolonizing vegetation, and potential mitigation measures including replanting disturbed areas and their effectiveness.

Page 3-17 contains the following mitigation measure: develop additional mitigation measures (using a certified engineer) between corridor miles 39 and 41 due to the presence of an active landslide in the vicinity of tower 40/3. The EIS should identify specific mitigation measures, predict the effectiveness of the mitigation measures, and predict the risks of mass movement and erosion with project implementation (including mitigation measures).

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Page 3-17 states that no unavoidable or adverse impacts to geology or soils are expected to remain following completion of the project if the mitigation measures and best management practices listed earlier are implemented. This conclusion appears unsupported since the EIS has not indicated if or where, and in some instances, what mitigation measures and best management practices would be implemented and the expected effectiveness of such actions.

Page 3-18 shows what fish species listed under the Endangered Species Act (ESA) are using the streams in the project area. The EIS should describe critical habitat for all listed species, the ESA process including Section 7 consultation, the consultation timeline, and a summary of biological assessments, especially conclusions about the likelihood of the proposed project adversely affecting listed species.

Page 3-21 states that since steelhead trout are a federally listed species and their distribution overlaps with both chinook and coho, the analyses of current conditions and potential impacts to this species also serve to describe all potential impacts to EFH. The EIS does not support this statement. The document should show life history and habitat similarities as well as similarities between the purposes of ESA and EFH before making this statement.

Page 3-23 generally discusses how the project could impact fish habitat through the transport of sediment and the removal of riparian habitat. The EIS talks about impacts such as how increases in sediment in low-velocity stream reaches can cover suitable spawning gravel, cause channel braiding, increase width:depth ratios, increase incidence and severity of bank erosion, reduce pool volume and frequency, and increase subsurface flow. The EIS does not state, however, to what extent these are problems in the project area or to what extent these would be problems with project implementation. The EIS should state this and support these conclusions with measurements of stream health including the parameters listed above and the amount of large woody debris and riparian vegetation. This information is especially important in streams identified as water quality impaired and containing sensitive and listed fish species.

Page 3-24 states that if areas cleared for tower footings were reseeded or naturally revegetated after construction, the potential for erosion and sedimentation would be less than if left as bare soil. The EIS should identify the location and the type and extent of reseeding and revegetating, and predict the reduced erosion and sedimentation for those sites.

Pages 3-24 and 3-25 describe numerous potential measures to mitigate construction impacts. For example, blasting should be avoided within 200 feet of fish-bearing streams or the road gradient should be 0%. The EIS should state proposed mitigation measures, describe where they would be implemented, and predict their effectiveness. The ROD should contain final commitments to implement such mitigation measures.

Page 3-26 states that Bonneville generally performs aerial inspections of transmission lines and access roads once a month. The EIS should state the overall condition of roads in the project area, problem areas in the road system, impacts from the problem areas, and the length of time to

fix road problems.

Pages 3-30 and 3-31 contains site-specific information about wetlands. The EIS should contain this level of information about other resources. A map of wetland resources in the project area would help the reader understand the location and extent of this resource.

Page 3-32 states that the construction of new access roads in association with the Hanford-John Day Alternatives B and C would potentially fill 0.1 acre of emergent wetlands. The EIS should describe the Clean Water Act Section 404 permitting process for this fill activity. We recommend that the EIS contain actions that compensate for the 0.1 acre filling, the removal of wetland buffer vegetation, and construction activities.

Page 3-34 states that erosion in areas of soil disturbance and vegetation removal could result in increased groundwater turbidity. The EIS should inform the reader of what areas are at risk, the level of that risk, possible levels of turbidity, and whether these levels are significant.

Page 3-35 describes potential impacts arising from the operation and maintenance of the proposed line due to the use of access roads for tower maintenance and vegetation clearing within the transmission line corridor. The EIS should describe what additional noxious weed control would be required due to areas being disturbed and the impact to water quality, vegetation, and wetlands functions from pesticides entering wetland systems.

Page 3-37 could include two additional mitigation measures at the site level (with estimates of effectiveness). These are to avoid using pesticides around wetlands and to pull weeds (i.e., mechanical control) prior to them developing seed heads.

Page 3-57 states that most nest sites for raptors occur on cliffs, although artificial structures such as power line towers are also used for nesting and perching. The EIS should state whether proposed or existing power lines towers could be and should be modified to enhance raptors' ability to nest on them.

Page 3-58 states that American white pelicans, a state-listed bird, are known to forage on islands located about 3 miles south of the project corridor. The EIS should describe to the south of where, along the 79-mile long project corridor, American white pelicans forage or include a map illustrating their location.

Page 3-59 states that during the spring 2001 surveys, four areas with burrows were identified in shrub-steppe habitat within the project corridor. If possible, the EIS should identify the animals using the burrows instead of listing all possible ones.

Page 3-60 states that there have not been any reports of sensitive-status reptiles in the project vicinity; however, suitable habitat is present for the following species. The EIS should report the results of surveys for reptiles in the project area.

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Pages 3-63 and 3-64 state that several 40- to 50-foot cottonwoods representing potential eagle perching habitat and located near the Corps' Wildlife Natural Area at the McNary Substation may need to be removed under the McNary Substation Alternative B to facilitate transmission line clearance. The EIS should state whether these trees can be moved to another location in the Corps' Wildlife Natural Area rather than being removed.

Page 3-64 should state if tower locations would impact burrowing owl burrow areas and if so, where towers would be relocated to avoid these areas.

Page 3-65 discusses impacts to passerines. This section should also discuss the impact of edge effect and habitat fragmentation from the existing and expanded transmission line corridor, especially how it can affect species composition.

Page 3-66 states that the project will require the construction of approximately 3 miles of new access road and 270 short spur roads, which would remove vegetation and wildlife habitat. We recommend that the EIS examine compensating for the loss of this land using land purchases or habitat enhancement projects.

Page 3-70 contains a very brief discussion of the avoidance of areas by wildlife. This section should additionally discuss wildlife avoiding the area because of a lack of cover and foraging and browsing plants. Page 3-70 states that raptors are often attracted to transmission towers to use them as nesting sites. The EIS should also recognize the use of transmission lines and towers as places where raptors perch to view the area for prey.

Page 3-73 contains the following mitigation measure: prior to construction, conduct raptor nest surveys of cliffs located within 0.25 mile of the right-of-way. EPA supports and NEPA requires information on the affected environment, however, data collection is not a mitigation measure. This information should already be included in the EIS to establish baseline information and determine project impacts.

Page 3-91 describes viewshed impacts from the proposed transmission line. The EIS should state whether those impacts would be significant or not.